

EPHRAIM SAVITT

Attorney at Law

260 MADISON AVENUE
22ND FLOOR
NEW YORK, NEW YORK 10016
WWW.SAVITTESQ.COM

(212) 679-4470
FAX: (212) 679-6770
EMAIL: EPHRAIM@SAVITTESQ.COM

November 25, 2014

BY ECF

HONORABLE RAYMOND J. DEARIE
U. S. District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

**Re: United States v. Bebars Baslan
Docket No. 13 CR 220 (RJD)**

Dear Judge Dearie:

This letter is respectfully submitted to ask for a 2-week adjournment for filing the objections to Bebars Baslan's pre-sentence report. That submission is due this coming Monday, December 1st. I am asking for December 15th as the new filing date.

The trial in which I am lead counsel before Judge Block for the past 5 weeks, United States Christian John, et al., continues with jury deliberations next week. Needless to say, because the trial involves racketeering and multiple murder charges, I have not had an opportunity to discuss fully with Mr. Baslan, who has strong views on these matters, the objections to the PSR that I believe are appropriate to raise. Given that lengthy post trial motions memoranda have been filed as to the principal two sentencing issues, I anticipate a far narrower submission addressing the PSR. But I need face time with my client in order to accomplish that. I will make it my business to meet with Mr. Baslan early next week.

I thank Your Honor for your courtesy and convey my best wishes for Thanksgiving.

Respectfully Submitted,

/S/

Ephraim Savitt

Cc By ECF: Clerk of the Court (RJD)
All Counsel